

**REMARKS**

Terminal Disclaimer form PTO/SB/26 is attached hereto. Also attached hereto is form PTO-2038, authorizing payment of the fee associated therewith. No additional fees are believed to be due with this communication. The Commissioner is authorized to charge any fees, and to credit any overpayment of fees, which may be required to Deposit Account No. 50-3159, referencing Atty. Docket No. CYBS5612CON.

In reliance upon the Examiner's indication of allowable subject matter, new independent claim 42 is submitted herewith. New independent claim 42 incorporates the subject matter of claim 36, as well as that of allowable claim 39.

Although Applicants thanks Examiner Lee for this indication of allowable subject matter, it is believed that the present application supports allowance of the somewhat broader claim 36 and its dependent claims, for reasons developed below.

Claims 36-38 were rejected as being unpatentable over Ramachandran et al.'s U.S. Patent No. 5,483,047 in view of Sass' European Patent No. EP0871079. Reconsideration and withdrawal of these rejections are respectfully requested.

The outstanding Office Action states that Ramachandran et al.'s modules are "are each provided with component tray arranging the modules to extend from the enclosure at a time." However, the claims do not recite that the modules are configured to extend from the enclosure. Instead, the claims recite that the "modules each include quick release interlocking clips allowing the modules to be attached to or separated free from one another." In Ramachandran et al., the modules are configured to extend from the ATM on rails. Ramachandran et al. does not teach or suggest that the ATM's modules each include quick

release interlocking clips allowing the modules to be separated from each other. To emphasize that the modules may be physically separated from one another, claim 36 has been amended to recite that the quick release clips allow the modules to be separated free from one another.

The Office acknowledges the above-described shortcomings of the primary reference and acknowledged that "Ramachandran et al. does not teach the specifics of each module including quick release interlocking mechanisms such as clips." For the Office's §103(a) rejection to hold, therefore, it falls to the secondary reference to Sass to teach the subject matter indicated to be missing from the primary reference.

However, Sass does not teach or suggest providing modules of a modular computer terminal with the claimed "quick release interlocking clips allowing the modules to be attached to or separated free from one another," as required by claim 36, whether considered singly or in combination with the Ramachandran et al. reference. The Office Action points to the fingers 400 of Sass as corresponding to the claimed "quick release interlocking clips allowing the modules to be attached to or separated free from one another." However, these fingers 400 are not configured to allow the several modules to be separated free from one another. In fact, the purpose of the fingers 400 is to retain a belt 10 of the CRU 200 in a shape that allows the belt to be slipped over a drive module without catching on other machine components. After the CRU 200 is installed, the fingers 400 are released, which causes the belt 10 to assume an operative position. The fingers 400 do not, as claimed herein, allow modules to be separated free from one another. Instead, the fingers retain the belt 10 so as to allow the CRU to be installed without damage. Then, the fingers 400 enable the belt 400 to slide onto the photoreceptor (P/R) module 300 – the belt 10 is never separated free from either the fingers 400 or the P/R module 300. The fingers 400 simply do not allow any module to be separated free from one another. Their sole

purpose is to allow the CRU to be installed without the belt 10 catching or otherwise being damaged. Sass's fingers 400 are also configured to allow a belt 10 to slide onto the P/R module, as specifically stated in Sass's Col. 7, lines 11-38:

As seen in Figures 3 and 5, the P/R belt is partially retained by molded fingers 400 which are located on the inboard and outboard areas of the right housing 194. Other retaining belt fingers 400 are located on the transfer detach housing 158 and left side housing 196. The housing has a molded feature 402 at the lower outboard end which positions the belt 10 on the P/R module 300 to prevent belt damage.

The fingers 400 retain the belt 10 and hold it in position during shipping and during installation of the CRU 200. The fingers 400 guide the belt 10 and cooperate with features 309 on the P/R module 300 to allow the belt 10 to slide safely into position when the CRU is inserted in the machine over the P/R module 300. When handle 315 is turned to extend the tension roll 20 and the developer backer bar 320 and cleaner brush and doctor blade, referred to generally as 206, the fingers 400 release the belt and it is then supported on the P/R drive module rolls 14, 16, 20. When the handle is rotated in the opposite direction to remove the CRU 200, the fingers 400 again capture the belt 10 and hold it in a shape to clear the P/R module 300. The fingers 400 provide a way to prevent damage to the belt 10 by preventing the belt from catching or otherwise being damaged by the CRU 200 or the P/R module 300 during installation and removal of the CRU and also by restraining the belt 10 during shipment.

Therefore, Sass is not believed to teach or suggest the very subject matter that is acknowledged to be missing from the primary reference. For this reason, it is not believed that the claimed invention would have suggested itself to the skilled artisan, even upon consideration of the combined teachings and suggestions of both the Ramachandran et al. and the Sass references. Such a person of skill perhaps would have been motivated to provide a modular computer terminal such as an ATM that included a Customer Replaceable Unit (CRU) containing fingers 400 to enable a belt or similar part to slip from the fingers onto a support. However, the combined teachings and suggestions do not support the Office's contention that consideration of the applied combination would have led a person of ordinary skill in the art to develop the claimed modular computer terminal that includes the claimed modules, each of which including quick release interlocking clips allowing the modules to be attached to or

separated free from one another. Failing such a teaching or suggestion, the 35 U.S.C. §103 rejections must be reconsidered and withdrawn. The same is therefore respectfully requested.

As the independent claims are believed to be patentable relative to the applied references, it is not believed necessary to discuss the rejections of the dependent claims at this time.

The claims were also subject to a double patenting rejection over commonly owned U.S. Patent No. 6,710,895. A terminal disclaimer accompanies the present amendment. Reconsideration and withdrawal of the double patenting rejections are, therefore respectfully requested.

It is believed that this Amendment places the present application in condition for allowance. Should the Examiner have any questions regarding this amendment or the application in general, the Examiner may contact the undersigned at the number referenced below.

Respectfully submitted,

Date: JAN 3, 2005

By: 

Alan W. Young  
Attorney for Applicants  
Registration No. 37,970

YOUNG LAW FIRM, P.C.  
4370 Alpine Rd., Ste. 106  
Portola Valley, CA 94028  
Tel.: (650) 851-7210  
Fax: (650) 851-7232

\\Ylserver\yl\CLIENTS\UMG\CYBS\5612\CONT\5612CON AMEND.1.doc